



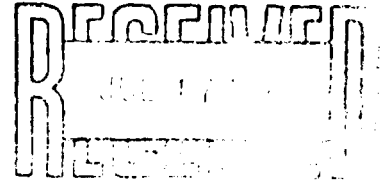
United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Drawer 1190

Daphne, AL 36526

July 16, 1992



Ms. Cheryl W. Smith, Remedial Project Manager
South Superfund Remedial Branch
United States Environmental Protection Agency
Region 1V
345 Courtland Street, N.E.
Atlanta, Georgia 30365

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Dear Ms. Smith:

We have reviewed the Phase 111 Sampling and Analysis Plan (Phase 111 SAP) for the Remedial Investigation/Feasibility Study (RI/FS) at the McIntosh plant site, Olin Corporation, McIntosh, Alabama dated June 1992, and offer the following comments.

Historically, the U.S. Fish and Wildlife Service (Service) has expressed concern about the lack of incorporation of the Tombigbee River into the RI/FS. In past correspondences, justifications were given by the Service as to the necessity of sampling the Tombigbee River in order to establish a complete database on the effects of mercury contamination from the Olin plant. Although the Phase 111 Sampling and Analysis Plan extends the sample areas just beyond the limits of the Olin Basin, it still remains deficient.

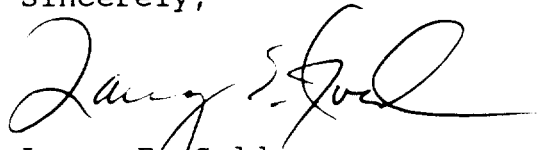
As stated in section 3.2 of the Phase 111 SAP, "...the horizontal and vertical extent of constituents was not defined by the site characterization... the objective for OU-2 is to define the horizontal and vertical extent of mercury in the sediments." Figure 16 shows one sample station where the discharge ditch enters the Tombigbee River. The Service does not feel this one station is adequate in determining the horizontal extent of mercury contamination. Mercury levels of 290 ppm and 227 ppm were found in sediments from the northeastern and eastern portion of the basin, respectively. During high water stages, the river flows into the basin where this high mercury concentration has been found, thereby possibly mobilizing this sediment into the river. Hence, additional sample areas should extend into the river adjacent to the basin.

The Phase 111 SAP does not mention collection and analysis of macroinvertebrates and fish. In order to adequately assess the extent of mercury contamination, biota, as well as sediment analysis, is an absolute necessity.

Since the Department of the Interior has entrusted unto the Service the responsibility for determining if damages may have occurred to its trust resources as the result of activities from the Olin Corporation at the McIntosh Site, we must remain adamant about incorporating the Tombigbee River into the RI/FS as an integral rather than a minor portion of the SAP. The Service's trust resources cannot be properly evaluated until the question of mercury contamination in the Tombigbee River has been completely addressed.

Again, we appreciate the opportunity for these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry E. Goldman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Larry E. Goldman
Field Supervisor